



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

TBM/SMF
F. #2021R00164

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 19, 2025

By ECF

The Honorable Rachel P. Kovner
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Shares of 21 East 61st Street Apartment Corp., et al.
Civil Docket No. 24-2147 (RPK) (JAM)

Dear Judge Kovner:

The parties respectfully submit the below status update pursuant to the Court's August 19, 2025 Order directing that a joint status update be filed by September 19, 2025. For the reasons set forth below, the parties respectfully request leave to file a further joint status update by October 20, 2025.

As previewed in the parties' August 18, 2025 status update, the government served additional special interrogatories on Claimant Hak Seon Kim on August 20, 2025 pursuant to Rule G(6) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions. Kim responded to those interrogatories on September 10, 2015. After reviewing those responses, the government does not at this time intend to move to strike any claimant under Supplemental Rule G(8)(c) but reserves all rights to do so should further discovery reveal deficiencies in standing or noncompliance with the Supplemental Rules.

The parties have started discussions to set a schedule for the next steps in this litigation: whether the claimants will make a motion to dismiss or whether the parties will

proceed to set a schedule regarding the scope and sequencing of fact discovery, including phased deadlines for document discovery and depositions.

The parties anticipate submitting either a joint proposed schedule or a brief statement of any competing proposals in the requested October 20, 2025 status update.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

By: /s/
Tara B. McGrath
Sean M. Fern
Assistant U.S. Attorneys
(718) 254-7000

MARAGARET A. MOESER
Chief
Money Laundering and Asset Recovery
Section, Criminal Division
U.S. Department of Justice

By: /s/
Joshua L. Sohn
Trial Attorney